

Exhibit P1

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**EASTERN PROFIT CORPORATION
LIMITED,**

Plaintiff/Counterclaim Defendant,

v.

STRATEGIC VISION US, LLC,

Defendant/Counterclaim Plaintiff.

Case No. 18-cv-2185 (JGK)-DCF

**PLAINTIFF’S RESPONSES AND OBJECTIONS TO DEFENDANT’S
CIVIL RULE 26.1 DEMAND**

Plaintiff/Counterclaim Defendant Eastern Profit Corporation Limited (“Eastern Profit”) hereby responds to Defendant/Counterclaimant Strategic Vision US, LLC (“Strategic Vision”), pursuant to Local Civ. R. 26.1 as follows:

1. The identity of all partners or members of Eastern Profit as of the date of this Demand.

RESPONSE: Eastern Profit objects to this request because it calls for the furnishing of information pursuant to Local Civil Rule 26.1(b), which applies to partnerships, limited liability partnerships, limited liability companies, or other unincorporated associations. Eastern Profit is a Private Limited Company registered under the laws of the Hong Kong Special Administrative Region of the People's Republic of China. As such, Eastern Profit has shareholders, not partners or members as described in Local Rule 26.1(b). As such, Eastern Profit Corporation Limited is subject to the disclosures of Local Rule 26.1(c), not Local Rule 26.1(b).

Accordingly, Eastern Profit hereby furnishes or discloses that it was registered in the Hong Kong Special Administrative Region of the People's Republic of China, has its principal place of business in the Hong Kong Special Administrative Region of the People's Republic of China. Eastern Profit is a citizen of the Hong Kong Special Administrative Region of the People's Republic of China for purposes of 28 U.S.C. § 1332.

2. The residence and domicile of each partner or member of Eastern Profit as of the date of this Demand.

RESPONSE: Eastern Profit objects to this request because it calls for the furnishing of information pursuant to Local Civil Rule 26.1(b), which applies to partnerships, limited liability partnerships, limited liability companies, or other unincorporated associations. Eastern Profit is a Private Limited Company registered under the laws of the Hong Kong Special Administrative Region of the People's Republic of China. As such, Eastern Profit has shareholders, not partners or members as described in Local Rule 26.1(b). As such, Eastern Profit Corporation Limited is subject to the disclosures of Local Rule 26.1(c), not Local Rule 26.1(b).

Accordingly, Eastern Profit hereby furnishes or discloses that it was registered in the Hong Kong Special Administrative Region of the People's Republic of China, has its principal place of business in the Hong Kong Special Administrative Region of the People's Republic of China. Eastern Profit is a citizen of the Hong Kong Special Administrative Region of the People's Republic of China for purposes of 28 U.S.C. § 1332.

3. The state or other jurisdiction where Eastern Profit was formed.

RESPONSE: Eastern Profit was registered in the Hong Kong Special Administrative Region of the People's Republic of China.

4. If one or more of Eastern Profit's claims in the Second Amended Complaint has been assigned, identify each original owner of each claim and identify any assignee of any claim.

RESPONSE: None of the claims in the Second Amended Complaint has been assigned.

Dated August 20, 2019

AS TO THE OBJECTIONS

EASTERN PROFIT CORPORATION LIMITED,
By its attorneys,

_____/s/Zachary Grendi_____
Zachary Grendi, Esq.
ZEICHNER ELLMAN & KRAUSE LLP
1 Landmark Square
4th Floor
Stamford, CT 06901
203-489-1233
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VERIFICATION

I, Yvette Wang, state that I have read the foregoing responses; that the responses were prepared with the assistance of counsel; that the responses are, subject to inadvertent and undiscovered errors, based on and therefore necessarily limited by the records and information I have reviewed, or by my personal knowledge of certain facts were so stated, and by information thus far discovered in preparing these responses.

I reserve the right to make any changes in the responses if it appears at any time that material omissions or errors have been made therein or that more accurate information is available.

Subject to these limitations, I state, under the pains and penalties of perjury, that the responses are true to the best of my knowledge, information and belief.

Date Executed: 8/20/2019

Golden Spring (New York) Ltd.

As attorney in fact for

Eastern Profit Corporation Limited

Signature: 

Name: Yvette Wang

Title: President

Sworn to before me this

20th day of August 2019


Notary Public

JENNIFER MERCURIO
Notary Public, State of New York
Reg. No. 02ME6394573
Qualified in Putnam County
Commission Expires July 8, 2023

CERTIFICATE OF SERVICE

I hereby certify that on August 20, 2019, the foregoing was emailed and served via U.S.

Mail, first-class postage prepaid, to the following:

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_____/s/Zachary Grendi_____
Zachary Grendi